

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

*IN RE:* Regina M. Dreher : CHAPTER 13  
: :  
Debtor. : 18-03124-MJC

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Regina M. Dreher :  
Movant, :  
: :  
v. : 11 U.S.C. §105  
: :  
First Commonwealth Federal Credit Union :  
Respondent :  
:

**OBJECTION TO MOTION TO COMPEL ACCOUNTING  
AND FOR OTHER EQUITABLE RELIEF**

First Commonwealth Federal Credit Union (the “Credit Union”), by and through its counsel, Fitzpatrick Lentz & Bubba, P.C., objects to Debtor’s Motion to Compel Accounting and for Other Equitable Relief, as follows:

1. Admitted.
2. Admitted
3. Admitted
4. Admitted
5. Denied. The Credit Union is not aware of Debtor’s “concerns” and therefore denies the same. However, the Credit Union avers that all payments have been applied correctly.
6. Denied.
7. Denied. The Credit Union is not aware of Debtor’s “beliefs” and therefore denies the same. However, the Credit Union avers that no funds have been misappropriated.
8. Denied. Debtor fails to cite any authority which might conceivably authorize the requested relief.

9. Admitted that Debtor is not a member of the Credit Union in good standing as she has caused it a loss, and therefore does not have access to a number of privileges including online banking. Moreover, no provision of the Bankruptcy Code or other law authorizes the requested relief.

10. Admitted that the Credit Union is not generating statements for the HELOC because this account has been charged off and the system is not capable of generating monthly statements.

11. Denied.

12. Denied. Debtor fails to cite any authority which might conceivably authorize the requested relief. Moreover, the Motion is also not consistent with the Rules of this Court and should be denied on this independent basis.

WHEREFORE, the Credit Union requests that Debtor's Motion be denied.

JOSHUA A. GILDEA

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Dated: June 9, 2022

By: /s/ Joshua A. Gildea  
Attorney for First Commonwealth Federal  
Credit Union